September 29, 2011 **This Report CONTAINS Confidential Business Information**

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CONFIRMATION OF RECEIPT REQUESTED

Document Control Office (7407M)
U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

SUBJECT: TSCA 8(e) SUBMISSION

Dear Sir or Madam:

(" ") is submitting certain data which we believe to be reportable under TSCA 8(e). The information concerns , an experimental sulfone insecticide compound. is identified by IUPAC as:

The CAS number assigned for this compound is .

has not imported for R&D on behalf of (" ") but plans to do so in the future.

The following reports concerning have been submitted to your agency:

- first acute oral toxicity study in rats (September 2, 2008: 8EHQ -08-17252)
- second acute oral toxicity study in rats (September 2, 2008: 8EHQ-08-17251)
- third acute oral toxicity study in rats (September 2, 2008: 8EHQ-08-17253)
- acute oral toxicity study in rats (December 18, 2010: 8EHQ-10-17828)
- one month/ one week oral toxicity in rats (July, 29, 2010: 8EHQ-10-18016)
- prenatal developmental toxicity study in rats (September 8, 2010: 8EHQ-10-18121)

- 4 day oral toxicity study in beagles (October 28, 2010: 8EHQ-10-18165)
- 4 week oral toxicity in beagles (April 15, 2011)

recently learned of new toxicological effects in a micronucleus test in rats. An outline of the studies follows:

Micronucleus test on in rats (preliminary test)
Single oral doses of 75, 150, 250, and 300 mg/kg of was administered to 8 week old male rats (5 animals/group).

Performing Laboratory

Animals: RccHan:Wist rats, male, 8 weeks old, 5 animals/dose group
Body weight: 243.3-265.5g
Route of administration: Single oral dose
Dose levels: 75, 150, 250, and 300 mg/kg
Dosing volume: 10 mL/kg
Vehicle: Corn oil
Observation items: Morality and clinical signs
Observation period: 2 and 4 hours after administration; once daily for 2 days thereafter

RESULTS:
Mortality: Two out of the 5 animals died in both the 250 and 300 mg/kg dose groups.
Clinical signs: Muscular rigidity was observed in the 150 mg/kg dose groups. Tremor was observed in the 250 and 300 mg/kg dose groups.

We judged that this TSCA 8 (e) report needed to be submitted based on the clinical signs observed.

Summary table:

Dose (mg/kg)	Clinical signs		Mortality
	Muscular rigidity	Tremor	
75	0/5	0/5	0/5
150	3/5	0/5	0/5
250	0/5	3/5	2/5
300	0/5	3/5	2/5

Substantiation of CBI Claims

We wish to substantiate s claims that certain information in this letter be treated as Confidential Business Information ('CBI'). All information which has been deleted from the sanitized version of this letter (copy attached) should be treated as CBI. In substantiation of this CBI claim, wishes to protect its confidential business plan for the commercial development of this compound. Disclosure of this information would harm 's efforts to commercialize this compound. Please refer to the attached letter of September 2, 2008 to Mr. Edward Gross regarding substantiation of CBI claims.

If there are any questions on this submission please feel free to contact me at ( ).

Yours sincerely,

Executive Director

Encl.
cc: